

ORIGINAL

Tamara Carmichael
 Christelette A. Hoey
 Joshua Krumholz (*Pro Hac Vice*)
 HOLLAND & KNIGHT LLP
 195 Broadway
 New York, New York 10007
 (212) 513-3200

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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ROGER R. CRANE, JR., :

07 Civ. 7063 (BSJ)(FM)

Plaintiff, :

-against- :

**NOTICE OF MOTION FOR
 PRO HAC VICE ADMISSION OF
 JOSHUA C. KRUMHOLZ**

POETIC PRODUCTS LIMITED, :

Defendant. :

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PLEASE TAKE NOTICE THAT, upon the annexed Affidavit of Tamara Carmichael and Verified Petition of Joshua C. Krumholz, the undersigned will move this Court before the Honorable Barbara S. Jones, U.S.D.J., at the United States Courthouse, 500 Pearl Street, Courtroom 2510, New York, New York 10007, at a date and time to be set by the Court, for an Order pursuant to the Local Rules for the United States District Court for the Southern District of New York granting *pro hac vice* admittance of Joshua Krumholz to the bar of this Court and permitting him to serve as trial counsel for the defendant, Poetic Products Limited, in the above-captioned case.

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FILED
 U.S. DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK
 NOV 15 PM 4:30

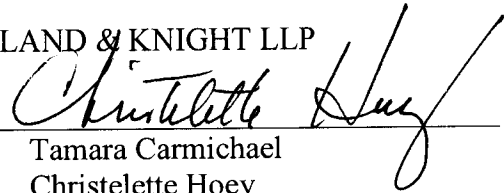
A proposed form of order is attached hereto.

Dated: November 15, 2007

Respectfully Submitted,

HOLLAND & KNIGHT LLP

By:

A handwritten signature in black ink, appearing to read "Christelette Hoey", is written over a horizontal line.

Tamara Carmichael
Christelette Hoey
Joshua Krumholz (*Pro Hac Vice*)
195 Broadway, Floor 24
New York, New York 10007
(212) 513-3200
(212) 385-9010 (fax)

Attorneys for Defendant

Tamara Carmichael
Christelette A. Hoey
Joshua Krumholz (*Pro Hac Vice*)
HOLLAND & KNIGHT LLP
195 Broadway
New York, New York 10007
(212) 513-3200

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ROGER R. CRANE, JR., :

07 Civ. 7063 (BSJ)(FM)

Plaintiff, :

-against-

:

:

:

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POETIC PRODUCTS LIMITED, :

Defendant. :

-----X

TAMARA CARMICHAEL, being duly sworn, deposes and says:

1. I am a partner with the firm of Holland & Knight LLP, attorneys for the defendant, Poetic Products Limited.

2. I am submitting this Affidavit in support of the application of Joshua Krumholz for admission to this Court *pro hac vice*.

3. I was admitted to practice in the courts of the State of New York in 2003. I am a member in good standing of the bar of each of those courts.

4. Mr. Krumholz is a partner with Holland & Knight LLP in our Boston office who specializes in intellectual property litigation. He will act as counsel in this case.

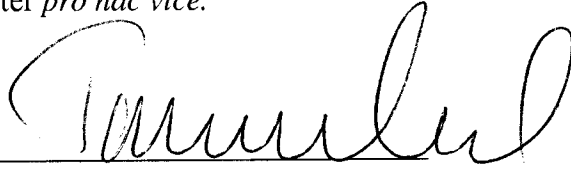
5. Mr. Krumholz is a member in good standing of the Bar of the State of Massachusetts, having been admitted to that bar in 1988. A certificate of good standing from the

Supreme Judicial Court of the Commonwealth of Massachusetts is attached to Mr. Krumholz's Verified Petition as Exhibit A.

6. Mr. Krumholz informs me that he is familiar with, and shall comply with the standards of professional conduct imposed on members of the bar of this Court, and he has agreed to be subject to the jurisdiction of this Court and of the courts of the State of New York with respect to any acts occurring during the course of his participation in this matter.

WHEREFORE, I respectfully request that Joshua Krumholz be permitted to appear as counsel and advocate in the above-captioned matter *pro hac vice*.

Dated: New York, New York
November 9, 2007



Tamara Carmichael

Sworn to before me this 9th
day of November, 2007



Notary Public

CORINTHIA A. BERNARD
Notary Public, State of New York
No. 24-4926858
Qualified in Kings County
Certificate Filed in New York County
Commission Expires April 11, 2010

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Tamara Carmichael
Christelette A. Hoey
Joshua Krumholz (*Pro Hac Vice*)
HOLLAND & KNIGHT LLP
195 Broadway
New York, New York 10007
(212) 513-3200

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

ROGER R. CRANE, JR., :

07 Civ. 7063 (BSJ)(FM)

Plaintiff, :

-against-

:

**VERIFIED PETITION FOR
PRO HAC VICE ADMISSION OF
JOSHUA KRUMHOLZ**

:

:

POETIC PRODUCTS LIMITED, :

Defendant. :

-----X

JOSHUA KRUMHOLZ, being duly sworn, deposes and says:

1. I am a partner in the law firm of Holland & Knight LLP, attorneys for the defendant, Poetic Products Limited. My business address is Holland & Knight LLP, 10 St. James Avenue, Boston, Massachusetts 02116.

2. I was admitted to practice in the courts of the State of Massachusetts in 1988. A certificate of good standing issued by the Supreme Judicial Court of the Commonwealth of Massachusetts is attached hereto as Exhibit A.

3. I have not been the subject of any disciplinary proceeding before any court or administrative body.

4. I certify that I have read and am familiar with the Local Rules of this District and the Federal Rules of Civil Procedure.

5. I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE, in view of the foregoing, and pursuant to Local Civil Rule 1.3(c), I respectfully request that the Court permit me to appear and participate in the above-entitled case *pro hac vice* as co-counsel for the defendant, Poetic Products Limited.

Dated: Boston, Massachusetts
November 2, 2007



Joshua C. Krumholz

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EXHIBIT

A

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

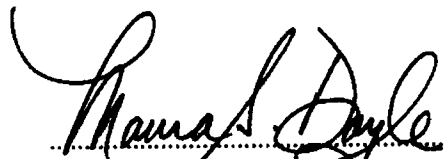
BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **fourteenth** day of **December** A.D. **1988**, said Court being the highest Court of Record in said Commonwealth:

Joshua Krumholz

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **twenty-ninth** day of **October** in the year of our Lord **two thousand and seven**.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

Tamara Carmichael
Christelette A. Hoey
Joshua Krumholz (*Pro Hac Papers to be Submitted*)
HOLLAND & KNIGHT LLP
195 Broadway
New York, New York 10007
(212) 513-3200

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ROGER R. CRANE, JR., :

Plaintiff, :

-against- :

07 CV 7063 Judge Jones

CERTIFICATE OF SERVICE

POETIC PRODUCTS LIMITED,

Defendant. :

-----X

I hereby certify, pursuant to Title 28 U.S.C. § 1746, that on November 15, 2007, I served a true and correct copy of the following documents:

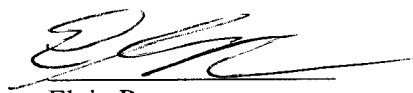
- 1) Notice of Motion for Pro Hac Vice Admission of Joshua C. Krumholz;
- 2) Affidavit of Tamara Carmichael in Support of Pro Hac Vice Admission of Joshua Krumholz;
- 3) Verified Petition for Pro Hac Vice Admission of Joshua Krumholz; and
- 4) Proposed order

by mailing it in a sealed envelope, with postage prepaid thereon, in an official depository of the U.S. Postal Service, to be delivered by First Class Mail to:

Frank H. Penski
Tamar Y. Duvdevani
NIXON PEABODY LLP
Attorneys for Plaintiff
Roger R. Crane, Jr.
437 Madison Avenue
New York, New York 10022

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 15, 2007.


Elvin Ramos
Holland & Knight LLP

Tamara Carmichael
Christelette A. Hoey
Joshua Krumholz (*Pro Hac Vice*)
HOLLAND & KNIGHT LLP
195 Broadway
New York, New York 10007
(212) 513-3200

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

ROGER R. CRANE, JR., :

07 Civ. 7063 (BSJ)(FM)

Plaintiff, :

**ORDER GRANTING PRO HAC VICE
ADMISSION OF JOSHUA KRUMHOLZ**

-against- :

:

:

POETIC PRODUCTS LIMITED, :

Defendant. :

-----X

THIS MATTER having come before the Court upon the application of Tamara Carmichael, a member of the bar of this Court, for entry of an Order, pursuant to Local Civil Rule 1.3(c), permitting the appearance *pro hac vice* of Joshua Krumholz, an attorney of the State of Massachusetts, on behalf of defendant, Poetic Products Limited, and the Court having considered the Affidavit of Ms. Carmichael sworn to November 9, 2007, the Verified Petition of Mr. Krumholz sworn to November 2, 2007, and the consent of all parties to Mr. Krumholz's admission, and the requirements for Mr. Krumholz's *pro hac vice* having been met; and good cause having been shown;

IT IS SO ORDERED on this _____ day of _____, 2007, that the application seeking the admission *pro hac vice* of Joshua Krumholz so that he may appear and participate in this matter on behalf of the Poetic Products Limited is hereby granted; and it is

FURTHER ORDERED that Mr. Krumholz shall abide by the Federal Rules of Civil Procedure, the Local Civil Rules and all disciplinary rules; and it is

FURTHER ORDERED that Mr. Krumholz shall have all pleadings, briefs and other papers filed with the Court signed by an attorney of Holland & Knight LLP who is a member of the bar of this Court and who shall be held responsible for them and for the conduct of this cause and of the admitted attorneys therein.

Hon. Barbara S. Jones, U.S.D.J.